



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RMT/JN/DG  
F. #2012R00103

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By ECF and FedEx

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Brooklyn, NY 11201

Re: United States v. Vitaly Korchevsky and Vladislav Khalupsky  
Criminal Docket No. 15-381 (S-1) (RJD)

Dear Counsel:

The government hereby makes the following disclosures.

I. Marketwired

As previously disclosed, the government expects to call James Gimbi to testify as an expert witness regarding forensic analysis conducted on Marketwired's computer systems.

Enclosed, pursuant to Title 18, United States Code, Section 3500, are certain materials pertaining to Mr. Gimbi's anticipated testimony on direct examination. These materials are saved in a file, and are designated 3500-JG-1. The documents are enclosed on a CD, and include the following:

- In the file named "SVN Backup - Incident Response.01.ToProduce.zip": Artifacts analyzed and working files created by the broader Mandiant team during the June/July 2013 incident response project at Marketwired (aka MFR13-095). Please note that not all of these materials were authored by Gimbi.
- In the file named "Evidence Tags.zip": Chain of custody documents regarding MFR13-095 artifacts, in digital and signed form.
- In the file named "Gimbi, James - Workspace.7z": Artifacts analyzed and working files created by Mr. Gimbi and others during MFR13-095.

- An explanatory readme file.

Please note that these materials are being produced to the defense subject to the protective order entered by the Court on January 5, 2016. Please further note that the scope of Mr. Gimbi's anticipated testimony on direct examination remains limited to the topics outlined in the government's March 15, 2018 disclosure. Finally, as discussed previously, the findings of the Mandiant team that will be the subject of Mr. Gimbi's testimony were set forth in detail in the Mandiant reports produced to the defense on March 6, 2017.

## II. Business Wire

In addition, the government hereby provides notice to the defense that it will call Robert Soares to testify as a computer forensics expert regarding the malicious cyber activity targeting the computer systems of Business Wire during the course of the charged conspiracy. Mr. Soares is the Chief Technology Officer of Business Wire. Details regarding the expected scope of Mr. Soares' testimony were provided to the defense in the government's March 15, 2018 disclosure, including the relevant underlying forensic reports.

As noted previously, the government reserves the right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

## III. PR Newswire

Also enclosed on the CD, and designated 3500-BP-1, please find an expert report and underlying notes and curriculum vitae for Bret Padres, who, as previously disclosed on March 15, 2018, will testify as a computer forensics expert regarding the malicious cyber activity targeting the computer systems of PR Newswire ("PRN") during the course of the charged conspiracy.

These materials are being produced to the defense subject to the protective order entered by the Court on January 5, 2016. The findings regarding the PRN intrusions, as well as

the bases for Mr. Padres' testimony, were set forth in the Stroz report, along with other documents, previously produced to the defense on March 6, 2017.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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Enclosure

cc: Clerk of the Court (RJD) (by ECF (w/o enclosure))